

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Amendment of the Commission's
Rules to Establish New Personal
Communications Services

) GEN Docket No. 90-314
) ET Docket No. 92-100

NOV - 9 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

) RM-7140, RM-7175, RM-7617,
) RM-7618, RM-7760, RM-7782,
) RM-7860, RM-7977, RM-7978,
) RM-7979, RM-7980
)
) PP-35 through PP-40, PP-79
) through PP-85

**COMMENTS OF
ROCK HILL TELEPHONE COMPANY,
FORT MILL TELEPHONE COMPANY,
AND LANCASTER TELEPHONE COMPANY**

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SUMMARY

Rock Hill Telephone Company, Fort Mill Telephone Company and Lancaster Telephone Company ("Rock Hill") advocate that a more expansive definition than the one proposed by the Commission be adopted. Specifically, criteria should be included that distinguish Personal Communications Services ("PCS") from other services. This should assure that the spectrum allocated for PCS is maximized and the service offering is expansive.

Rock Hill recommends that the Commission allocate five licensed channel sets of 20 MHz each in every service area for PCS. Also, additional unlicensed spectrum should be allocated for wideband and narrowband applications.

Rock Hill further urges the Commission to adopt PCS service areas that are no larger than the MSAs and RSAs used for cellular service and Interactive Video and Data Service. It is important that a distinction be made between metropolitan and non-metropolitan areas, so that PCS be deployed to all areas of the country.

With regard to eligibility, Rock Hill emphatically advocates the full participation of local exchange carriers in the provision of PCS in their own exchange service areas. This also means that such carriers should not be precluded from PCS participation by virtue of their ownership of cellular interests. Local exchange carrier participation in PCS will assure

that its obligations are met and viability maintained, and that its customers' interests are fostered, particularly in non-metropolitan areas. This important objective can be further accomplished by the creation of a spectrum reserve of one of the five 20 MHz licensed spectrum blocks for the local exchange carriers operating in RSAs.

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**COMMENTS OF
ROCK HILL TELEPHONE COMPANY,
FORT MILL TELEPHONE COMPANY,
AND LANCASTER TELEPHONE COMPANY**

Rock Hill Telephone Company, Fort Mill Telephone Company, and Lancaster Telephone Company (hereinafter jointly referred to as "Rock Hill") hereby submit their comments to the Notice of Proposed Rule Making and Tentative Decision in the captioned proceeding, FCC 92-333, released August 14, 1992, ("Notice"). Rock Hill is a party to this proceeding, having filed Comments and Reply Comments to the Notice of Inquiry in this proceeding. In addition, Rock Hill Telephone Company holds an experimental license for the provision of Personal Communications Services ("PCS") in its local exchange service area. Rock Hill therefore recognizes the importance of PCS technology and the necessity of deploying advanced wireless service to subscribers as quickly as possible.

In the Notice, the Commission recognizes not only the developments of wireless

technologies but also the potential that their deployment holds for the American public. This includes improved flexibility and functionality of the telecommunications network, creation of new markets and development of or increase in competition in all markets, increased productivity and efficiency in many industries, and a boost to this country's international competitiveness.¹ In order to maximize its objectives, the Commission states that it must assure that PCS providers have the ability to offer service to "existing and new markets in an economic and responsive manner."² The Commission further states that it will advance the goals of the Communications Act by taking steps to assure that mobile services are provided at the highest quality at reasonable rates to the greatest number of consumers.³

I. Definition of PCS

The definition proposed by the Commission for PCS is quite broad and designed to encompass a wide range of technologies and proposed new services.⁴ While this definition does not exclude any current or proposed aspect of PCS, it does not specify PCS as a new competitive service offering. Many parties have filed comments in response to the Notice of Inquiry, participated in the Commission's en banc hearing, and over 150 parties have obtained experimental licenses for providing various aspects of PCS, including Rock Hill Telephone Company. The interest in this new type of service is expansive. By its

¹Notice at para. 4.

²Notice at para. 6.

³Id.

⁴Notice at para. 29.

definition, the Commission should encourage the development and deployment of personal communications that includes separate radio systems that can be used to provide voice and basic data services to low power, portable sets that operate on dedicated frequencies. Also, the definition should encourage compatible systems that allow maximum user mobility and transportability.

Specifically, Rock Hill suggests that the adopted definition of PCS encompass a family of person-specific telecommunications services that can do the following: (1) employ hand-held wireless devices that utilize low power with a common air interface and can be used to originate, receive and maintain communications while the user is on the move; (2) uses a callable number for each individual subscriber that is reachable wherever the subscriber is located; (3) provides unrestricted access to the public switched telephone network; and (4) embodies a basic group of standardized features that perform in the same manner at any location where PCS is provided.

If these criteria are included in a PCS definition, the Commission can enhance the telecommunications infrastructure by maximizing the use of the spectrum allocated for PCS and assure that the service is offered to the greatest number of subscribers possible.

II. Spectrum Allocations

Throughout the proceeding, Rock Hill has supported the position that an adequate amount of spectrum should be allocated for PCS in order that the projected demand for the deployment of new technology is met. The Commission is now proposing to allocate

110 MHz in the 2 GHz band.⁵

Rock Hill advocates an allocation of five licensed channel sets of 20 MHz in each service area. Such an allocation should be sufficient to support the type of PCS activity that can be reasonably projected. All licensees should be given the opportunity to utilize the same amount of spectrum so that the service offerings are competitive. In addition, Rock Hill recognizes the need for allocation of additional, unlicensed spectrum to be divided between narrowband and wideband applications. These separate allocations for the unlicensed narrowband and wideband uses should reduce potential interference.

It follows that, with the proposed allocation of 100 MHz for licensed PCS, five designated service providers per market should be contemplated. This number of PCS providers would, as the Commission suggests, assure that a wide range of service would be offered to meet the needs of subscribers at competitive and reasonable rates.⁶

III. Licensing Issues

- A. Geographic service areas should be the size of the current cellular areas or smaller.

The Commission offers four options for PCS serving areas, all of which are for areas larger than the MSA and RSA designations used for licensing of cellular service and Interactive Video and Data Service. It seems ironic that the suggested licensing areas for

⁵Notice at para. 32.

⁶Notice at para. 34.

PCS, which employs microcell technology and serves subscribers that are either stationary or move primarily on foot, are geographically more expansive than those for cellular, which has higher power cells and serves customers primarily in vehicles travelling at high speeds.

Rock Hill urges the Commission to adopt for PCS the 734 MSA and RSA licensing areas. This position is consistent with Commissioner Quello's statement that the MSA and RSA designations should be seriously considered for PCS areas.⁷ Adoption of these smaller service areas would best meet the four values set forth by the Commission for developing a regulatory structure for PCS. The use of these service areas would best serve the public. They are the only option that recognizes the difference between metropolitan and non-metropolitan areas, a recognition which is necessary to properly allow for the inherent differences in these two types of markets. With the existence of competition in the provision of PCS, the establishment of common air interface will be necessary, which will allow PCS customers to use their handsets in any location. Such a situation will remove the need for large serving areas under the control of a single licensee. Also, smaller serving areas will encourage competition, since the number of competitors will be expanded and diversified.⁸ Increased competition should lead to greater product and service innovation. Furthermore, smaller service areas should result in quicker deployment of PCS to non-metropolitan and less economically developed areas. This is so because licensees with larger areas would be more likely to concentrate their resources on the more

⁷Separate Statement of Commissioner James H. Quello, Re: Amendment of the Commission's Rules to Establish New Personal Communication Services, Erratum, released August 14, 1992.

⁸The Commission acknowledged this as a distinct possibility. Notice at para. 59.

profitable (i.e., metropolitan) areas to maximize their return on investment.

B. Eligibility Requirements

1. Local exchange carriers should be allowed to offer PCS in their own service areas.

Rock Hill has advocated full local exchange carrier participation in PCS throughout this proceeding.⁹ One of the most compelling arguments for the Commission to adopt this policy emanates from the universal service obligations of all local exchange carriers. As technological advances have been made, they have been implemented by the local exchange carriers. The public has benefitted from this with each new technological introduction. The telephone companies have consistently employed new technology over the years, providing service that has evolved from the early magneto system to a modern, multi-featured digital system. The Commission tentatively concluded that there is a strong case for allowing local exchange carriers to provide PCS in their own service areas.¹⁰ Rock Hill agrees with the Commission's conclusion and urges the Commission to allow local exchange carriers to offer PCS.

PCS is a new technology that will further improve local exchange service if the local exchange carriers, who are the most highly qualified and therefore most logical PCS providers, are not prohibited from participation by regulatory constraints. The Commission acknowledged that PCS will likely first complement local exchange service and later become

⁹Rock Hill Comments and Reply Comments to the Notice of Inquiry, ex parte presentations on May 21, 1992.

¹⁰Notice at para. 75.

a full fledged competitor.¹¹ The local exchange carriers must be allowed to deploy this new technology if they are to continue to meet their universal service obligations.

By their participation in PCS, local exchange carriers will facilitate the rapid availability and economical deployment of PCS due to their resources and expertise. Specifically, exchange carriers have the following:

- (i) the expertise in providing existing telecommunications services;
- (ii) the financial resources;
- (iii) the infrastructure in place; and
- (iv) the public service commitment

that will enable them to effectively and efficiently bring PCS to the public throughout the nation, in both metropolitan and non-metropolitan areas. Utilization of these resources would foster the Commission's stated goals of universality, speed of deployment and competitive delivery of PCS.

Local exchange carrier provision of PCS would also enhance the utilization of the public switched network by increasing its capability and efficiency. The technological evolution of the network and local exchange service has benefitted both customers and all providers, including interexchange, cellular and local exchange carriers. Likewise, local exchange carrier participation in the deployment of PCS will assure that the local exchange network will have the capability of supporting all PCS providers' needs and facilitate the interoperability of different PCS systems. Compatible PCS systems must be developed so

¹¹Notice at para. 71.

that any PCS customer can use a PCS device from any served location. This is critical to the universality of PCS. It will assure that PCS will be brought to the marketplace as quickly as possible. Integration of PCS with the exchange network will allow PCS customers to utilize the intelligent network features that are now available or will be added in the future.

Local exchange carrier provision of PCS will benefit local exchange customers. As stated above, exchange carriers have historically implemented new technology as part of their universal service and public interest obligations. This has resulted in not only vast improvements in service and enhanced offerings, but also greater efficiencies and lower costs. Deployment of PCS is no exception. It would enable exchange carriers to operate more efficiently and thereby provide savings for existing and future customers. Also, participation in PCS would help offset possible revenue reduction which could result from customer migration from landline to wireless services. If such reductions occur and are not offset, the remaining landline customers would have to cover fixed service costs. Another aspect of the benefits to customers of allowing exchange carriers to provide PCS is the virtual assurance that PCS would be offered in non-metropolitan parts of the country. Non-local exchange carrier providers of PCS will look to serve the most densely populated and most profitable areas first, leaving the isolated and less economically feasible regions unserved. It is vital that PCS be available to these non-metropolitan areas, both for the residents and for the economic development of those regions. The local exchange carriers have consistently demonstrated a commitment to serve and at the present time have a commitment and the ability to bring PCS to less-populated areas quickly. For this reason,

they should be allowed to offer PCS.

Local exchange carrier provision of PCS will also contribute to the competitive delivery of PCS. The level of interest in PCS by exchange carriers, both large and small, is evidenced by the number of applications for experimental licenses for PCS filed by local exchange carriers, including one for Rock Hill Telephone Company, and by their participation in this proceeding. This would certainly translate into rapid deployment of PCS in the exchange carriers' service areas so that they could provide expanded service offerings to their customers. Such broad and early deployment will lead to increased demand for and production of PCS equipment and thereby result in cost reductions. This will ultimately mean lower costs to providers and lower prices to PCS customers. Therefore, exchange carrier offering of PCS should lead to enhanced competition among all providers. It will also assure, as indicated above, that the infrastructure is adequately developed to foster PCS deployment.

In summary, local exchange carrier full participation in the provision of PCS would foster all four of the Commission's stated objectives for PCS.

2. A local exchange carrier's cellular holding should not adversely affect its eligibility to provide PCS.

In seeking comment on local exchange carrier eligibility for PCS, the Commission refers to a possible bar by virtue of an exchange carrier's cellular holdings.¹² In the

¹²Notice at para. 76.

discussion of cellular eligibility, the Commission proposes a severe ownership standard by which no party with an ownership interest of more than one percent, direct or indirect, in a cellular license could have an ownership interest, direct or indirect, in a PCS license serving the same geographic area.¹³ The rationale for considering a cellular ownership prohibition for PCS is that cellular licensees could use their existing spectrum to provide PCS and that, if cellular licensees could acquire PCS licenses in their own service area, they could use them to inhibit competition.¹⁴

The effect of these policies, if adopted, would be to render any local exchange carrier ineligible for a PCS license if it holds virtually any interest in a cellular system serving its exchange area. For example, Rock Hill, Fort Mill, and Lancaster Telephone Companies are each minority limited partners in a limited partnership, which, in turn, is a 50% general partner of the wireline licensees for the RSAs in which these telephone companies' local exchange service areas are located. The other 50% general partner and manager of those RSA cellular partnerships is a subsidiary of a large telephone holding company. The Rock Hill companies, with their minority interest in the limited partnerships, do not operate or control the cellular systems, nor can they utilize the spectrum allocated to the cellular systems to offer PCS-type services to their local exchange customers.

If such a restriction as contemplated by the Commission were invoked, local

¹³Notice at fn. 46.

¹⁴Notice at paras. 64-66.

exchange carriers such as Rock Hill would be effectively and decisively cut out from the PCS market and their exchange customers would be penalized by not receiving the advantages that the local exchange carrier could offer in deploying new PCS technology. The very reasons the Commission and parties such as Rock Hill are advancing for full local exchange carrier participation in PCS far outweigh any arguments to disqualify them because of a minority interest in a cellular licensee. Furthermore, Rock Hill has delineated significant differences in PCS and cellular characteristics. These differences should not be glossed over in crafting eligibility and other requirements for PCS. Rather, the differences should be preserved and their separate development fostered. One way of achieving this objective is to encourage local exchange carrier participation in the deployment of PCS. Another is to not link any interest in other services, such as cellular, with exclusionary rules for PCS participation. Therefore, for the reasons stated above, the severe cellular ownership restriction on PCS eligibility is unwarranted and should not be adopted.

3. The Commission should create a spectrum reserve for all local exchange carriers operating in RSAs.

Rock Hill has advocated local exchange carrier participation in PCS as a means of assuring its deployment in all areas of the country. A very real need exists for the telecommunications infrastructure, including PCS, to be fully developed in non-metropolitan areas. The National Telecommunications and Information Administration ("NTIA") has specifically recognized the need to assure that such regions benefit from technological developments and do not suffer adverse economic and personal

consequences.¹⁵

Rock Hill has also argued that PCS is a new technology that local exchange carriers should be able to utilize for local exchange service. This is particularly critical in non-metropolitan areas, such as those served by Rock Hill. The detrimental effect on exchange carriers serving non-metropolitan areas, if they are unable to implement this technology, would be especially severe.

For these reasons, Rock Hill advocates that the Commission establish a spectrum reserve for local exchange carriers serving RSAs to obtain one of the five 20 MHz licensed blocks for the provision of PCS in their own exchange areas. Under this plan, one block in each RSA would be assigned to the exchange carriers serving that RSA. Those exchange carriers would individually use the 20 MHz block within their particular local exchange area. Specified construction periods and service dates could be required. A condition could also be imposed that the exchange carriers use this spectrum only as a part of their exchange service operations and not be permitted to resell it separately. Adoption of this proposal would be especially beneficial to smaller exchange carriers whose service areas lie in the RSAs. They will not be able to compete realistically in any "aftermarket" to obtain licensed spectrum in their exchange area because they would not be able to pay what a licensee could demand for a small geographic portion of a broad licensed area.

¹⁵National Telecommunications and Information Administration, NTIA Telecom 2000 at p. 90 (1988).

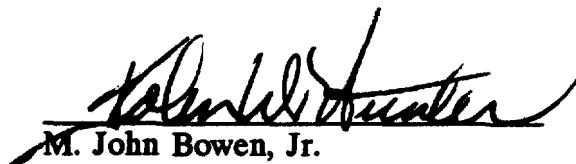
IV. Conclusion

Rock Hill urges the Commission to adopt a definition for PCS that is broad enough to encompass new technological developments but yet specific enough to distinguish PCS from other service offerings. Rock Hill advocates that 100 MHz be allocated for PCS in the 2 GHz band, divided into five licensed blocks of 20 MHz each. Also, Rock Hill recommends that the PCS licensing areas follow current MSAs and RSAs. Finally, Rock Hill advocates that local exchange carriers be eligible for PCS licenses and that interests in cellular systems not be a bar to such participation. In this regard, a spectrum reserve of one of the five 20 MHz blocks should be utilized for local exchange carriers whose exchange areas are in RSAs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Shannon G. Eubanks, hereby certify that a copy of the foregoing Comments of Rock Hill Telephone Company, Fort Mill Telephone Company, and Lancaster Telephone Company was mailed, postage prepaid, first-class United States mail, this ninth day of November, 1992, to the parties on the attached list.

A handwritten signature in cursive script, reading "Shannon G. Eubanks", written over a horizontal line.

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